



Leon Howard <lhowardiii@gmail.com>

Eppie v. EPD, Pacheco

3 messages

Mark Basham <mbasham@bbpcnm.com>

Tue, Dec 2, 2014 at 9:23 AM

To: leon@lawoffice-lh.com

Morning Leon. Our responses to your discovery are due on the 9th. We were just informed that officer Pacheco is on indefinite emergency medical leave (due to his father's health). Rather than request an extension we are going to note this fact in our responses and indicate that we will supplement our responses as soon as he returns to work. If you want to handle it differently let me know.

Mark A. Basham, Esq.

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Leon Howard <leon@lawoffice-lh.com>

Wed, Dec 3, 2014 at 11:21 AM

Reply-To: leon@lawoffice-lh.com

To: Mark Basham <mbasham@bbpcnm.com>

Cc: Joachim Marjon <jmarjon@gmail.com>

Hi Mark,

I am sensitive to Officer Pacheco's need to help care for his father. The only portion of your proposal that makes me a little uncomfortable is the indefinite nature of Officer Pacheco's leave from work and how exactly this correlates to responding to discovery. I am fine with a note as to which answers will be supplemented, but do you think we can agree to have the supplemental answers 30 days from December 9th?

Please do not take this message as unsympathetic, I just want to make sure that an indefinite period does not turn into forever.

I note Plaintiff's responses to Defendants' discovery as due today, and I will be getting those out to you today.

Take care



Leon F. Howard III

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Mark Basham <mbasham@bbpcnm.com>

Wed, Dec 3, 2014 at 12:54 PM

To: leon@lawoffice-lh.com

Cc: Joachim Marjon <jmarjon@gmail.com>

Yes I will agree to the 30 days from 12/9.

Mark A. Basham, Esq.

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From: lfhowardiii@gmail.com [mailto:lfhowardiii@gmail.com] **On Behalf Of** Leon Howard

Sent: Wednesday, December 03, 2014 11:21 AM

To: Mark Basham

Cc: Joachim Marjon

Subject: Re: Eppie v. EPD, Pacheco

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